87583.000260

REMARKS

Applicants request reconsideration and allowance. Claim 1 is amended to correct the grammatical error noted by the examiner and this amendment does not alter the scope of the claim. These remarks will show that the office action and the cited reference of Morich fail to make a prima facie case of anticipation or obviousness. In order to make a prima facie case, Morich must show all the limitations of the claims.

Morich does not show all the limitations of the claims. In particular, Morich (US 6,198,466) has no means for switching between two fixed voltages, it has no voltage divider that responds to the switched voltage, it has no voltage divider that provides one of two voltages for each switched fixed voltage, and it has no means for applying the switched, fixed voltage to the voltage divider to provide one of two outputs for a row and one of two outputs for a column.

Claim 1 requires means for switching between first and second fixed voltages.

The rejection and Morich fail to show or suggest a means for switching between two fixed voltages. The portion of the specification relied upon by the rejection has no structure. Instead it recites a desired result where a pixel will be either transparent or reflective depending upon one of two absolute voltages that are applied to the pixel. That portion of Morich fails to identify a switch that operates between the two absolute voltages. The rejection appears to assume, erroneously, that there is such a switch. Instead, the detailed description of Morich shows a system that generates five voltages (including ground) and applies two or more of the five voltages to the pixels in order to achieve the desired absolute voltage across a pixel.

The detailed specification of Morich does not show or suggest a means for switching between two fixed voltages. The rejection finds that Vtrans and Vbright are the

00005182.DOC

87583.000260

first and second fixed voltages. Morich indicates that Vtrans = Vmax = 60 v and Vbright = 2/3 Vmax = 36 volts. See column 9, lines 32-54. It follows that the rejection, in view of Morich, equates Vtrans to Vmax (90 volts) and Vbright to 2/3 Vmax (36 volts).

Before one can switch between Vmax (Vtrans) and 2/3 Vmax (Vbright), those voltages must be generated. The voltage multiplier 90 generates Vmax (Vtrans), 2/3 Vmax (Vbright) and 1/3 Vmax voltages. But the voltage multiplier 90 does not switch between Vmax (Vtrans) and 2/3 Vtrans (Vbright). Instead, all its outputs are always available to the row and column drivers. In particular, Vmax is connected to the column driver and 2/3 Vmax is connected to the row driver. The two drivers cannot be the means for switching because the drivers do not switch between the two voltages. The voltages are applied to different drivers. In addition, the rejection reads the row and column on the voltage divider of the claims. Thus, there is no means for switching between two fixed voltages.

The rejection erroneously finds that the row and column drivers are voltage dividers. A voltage divider is a circuit fragment that receives an input voltage and provides an output voltage that is a fraction of the input. Attached is a copy of a page 8 from a reference, The Art of Electrical Engineering. It explains what a voltage divider is and how it works. Voltage dividers are very well known circuit fragments that alter voltages. There is no disclosure in Morich that their row or column drivers include voltage dividers. There is no disclosure in Morich or any other reference that drivers, per se, include voltage dividers. Nor is there any disclosure in Morich that its row or column drivers supply fractions of their input voltages to their outputs. Thus, neither the structure nor the function of a voltage divider can be found in the row and column drivers of Morich.

The row and column drivers do not respond to the alleged first and second fixed voltages Vmax (Vtrans) and 2/3 Vmax (Vbright) to provide one of two fixed voltages. In paragraph 5 of the office action the rejection states that the row and column drivers respond to Vmax, 2/3 Vmax and 1/3 Vmax. That is incorrect. Instead, each driver

87583.000260

responds to its four control lines, not to Vmax or 2/3 Vmax or 1/3 Vmax. The row driver either applies or does not apply the voltage Vmax, or 2/3 Vmax or 1/3 Vmax to the respective row or column. It does not respond to those voltages; it merely passes them along.

In summary, the above remarks demonstrate that Morich has no means for switching and no voltage divider. A notice of allowance is respectfully requested.

Respectfully submitted,

Thomas R. FitzGerald

Reg. No. 26,730

Law Office of Thomas R. FitzGerald Reynolds Arcade Building, Suite 210 16 E. Main Street Rochester, New York 14614-1803

Telephone: (585) 454-2250 Facsimile: (585) 454-6364